

Reply Comments to Docket #02-277

To the Commissioners

I have followed this proceeding, docket #02-277 with great interest. The issues involved will certainly have a significant impact on our media landscape as well as on society at large. As such I believe it is important to find ways to engage the public in discussion and participation on these issues. I commend you for creating a simplified version of your online comment filing form, and the various forums and hearings that are happening around the media ownership rules review.

I am disturbed, however by the various parties who, at the forum in New York, in the press, and in comments in this proceeding, have suggested that the only meaningful input into this proceeding consists of very narrowly defined quantitative data that can disprove the claims that media consolidation has benefited the American people.

It is hard for me to explain to students I come in contact with why it is that the public, who have not been well informed or engaged in these matters, must bear the burden of proof to justify why and how a more concentrated media system has hampered diversity and competition against the claims of countless well-funded industry lobbyists and lawyers. It is a bit mind-boggling. No matter how the times have changed, the rules at one time were thought sound. Common sense dictates that the onus of proof should be in justifying changes to the status quo, not maintaining it.

While I understand that the broadcast ownership rules must be defensible in the courts, I simply don't buy that statistical data should be the only grounds on which these matters are evaluated, especially when numbers can be manipulated. History has proven repeatedly that science is only as objective as the people conducting it.

I think more credit needs to be given to the American people that they know a problem when they see one, whether or not they have time or the resources to study it in detail. Various broadcast representatives at the NY forum contended that we must get away from the visceral feeling that "big is bad." But I think we need to ask WHY DO so many people think that big is bad? We need to look at how many people think that, versus how many believe we should stay the course to more deregulation and concentration. If we have to look at numbers, let's look at those numbers. That seems a simple and obvious way to quantify the issue, but one that has been overlooked. The FCC claims they don't have the metrics to measure in the public interest, but it seems to me there are ways of taking some metrics used by the industry and using them to come up with some valuable numbers in the public interest. For example, why does the FCC not commission a public opinion poll? Then you would be able to say "78 percent (or whatever number) of Americans polled oppose or support more media consolidation."

Another way to view public input in a quantifiable form would be to use a formula similar to those of newspapers or television stations

in measuring public sentiment on an issue. I have heard that every letter or call received is estimated to represent the views of 100 or 1000 (or whatever the correct ratio is) others. Sorry I can't be more specific, but you get the idea. A similar kind of formula could be applied to the comments that the FCC has received in this proceeding, adjusted for the fact that hardly anybody knows that this proceeding is even going on.

It seems that the kind of quantifiable/empirical evidence the FCC is requesting cannot be easily available in the timeframe that you have allotted for this proceeding. Since the system certainly seems to favor those with the time and resources to commission studies and create reams of legal filings, it raises questions about how sincere the FCC is about having balanced empirical data that truly represents the interests of the American public. These are complicated issues that many people are unfamiliar with, yet it does not mean that they are any less dependent on or concerned about the media in question for their news and entertainment. The FCC must figure out a way to gather and weight their views equally.

Thank you,

Inja Coates